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Additional Counsel for the Class

# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Civil Action No. 18-cv-04772 (JMV) (JBC)

IN RE CELGENE CORPORATION SECURITIES LITIGATION

NOTICE OF LEAD PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE SECOND AMENDED CONSOLIDATED CLASS ACTION COMPLAINT

#### TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on July 9, 2021, the undersigned attorneys for Lead Plaintiff AMF Pensionsförsäkring AB ("Plaintiff") will move before the Honorable John Michael Vazquez of the United States District Court, District of New Jersey, Martin Luther King Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order permitting Lead Plaintiff to amend the Second Amended Consolidated Class Action Complaint pursuant to Federal Rule of Civil Procedure 15(a) and file the Third Amended Consolidated Class Action Complaint, and for such other and further relief as the Court may deem just and proper;

PLEASE TAKE FURTHER NOTICE that a Memorandum of Law, and a declaration of James E. Cecchi, attaching the Proposed Third Amended Consolidated Class Action Complaint as Exhibit 1 and a redline comparison against the Second Amended Consolidated Class Action Complaint as Exhibit 2, are filed herewith;

PLEASE TAKE FURTHER NOTICE that on Thursday, July 8, 2021, Plaintiff requested Defendants' consent to this Motion. On July 9, 2021, Defendants indicated that they do not consent to this Motion.

Dated: July 9, 2021

/s/ James E. Cecchi

James E. Cecchi

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Respectfully Submitted,

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Additional Counsel for the Class

**CERTIFICATE OF SERVICE** 

I, James E. Cecchi, hereby certify that on July 9, 2021, I caused a true and correct copy of

the foregoing Notice of Lead Plaintiff's Motion for Leave to Amend the Second Amended

Consolidated Class Action Complaint to be filed electronically with the Clerk of the Court using

the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's

electronic filing system. I declare under penalty of perjury that the foregoing is true and correct

to the best of my knowledge.

Dated: July 9, 2021

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.

<u>/s/ James E. Cecchi</u> James E. Cecchi